<div align="center">REMARKS</div>

This amendment is being filed along with a Request for Continued Examination (RCE) in response to the final Office Action dated August 10, 2007. Various claims are amended as shown. No new matter has been added. Claims 1-50 and 79 were previously canceled without prejudice. Claim 54 is canceled herein without prejudice. With this amendment, claims 51-53, 55-78 and 80-97 are pending in the application.

I. Specification

The specification is amended as shown above, in particular an amendment to the paragraph on page 13, lines 9-23. Specifically, a typographical correction is made to recite the server unit --204--, instead of the server unit "202" in page 13, line 19. It is respectfully submitted that this correction does not introduce new matter, and is in fact being made to conform this portion of the written description with other portions of the written description and with the figures.

For example, the preceding sentence on page 13, lines 15-18 is discussing features of the server unit 204 to store "metadata, threading, directory path, attachment, and properties information …" (emphasis ours). The next sentence (the sentence corrected herein) then says (emphasis ours): "This allows the engine 122 to perform search queries on the contents … based on search criteria such as Bates number, source, recipient, date of transmission, modification date(s), cc'ed individuals, etc." Thus, it is evidently clear that the engine 122 applies said search queries to the contents of the server unit 204.

Furthermore for example, page 14, lines 9-15 of the application provides the following description (emphasis ours), which is consistent with the amendment to the specification herein and with the other portions of the written description as filed:

"Similarly, when a non-textual or metadata content search query (e.g., a search query requesting email messages sent by a specific individual on a specific date, etc.) is sent by the user from the terminal 114 to the server 112 through the server unit 206, the engine 122 applies the query to the contents of the database(s)

in the server unit 204. The server unit 204 also can be searched in this fashion to identify a plurality of email messages belonging to a conversational thread and to identify attachments of email messages."

It is therefore kindly requested that the amendment to the specification be entered.

II.   Substance of the interview

The present Office Action included an Interview Summary (form PTOL-413) that provided the Examiner's summary of the telephone interview, which was held with the applicants' attorney (Dennis M. de Guzman) on February 7, 2007. The following is the applicants' Substance of the Interview, which said form PTOL-413 indicated as needing to be included with this present response to the Office Action:

- The date of the telephone interview occurred on February 7, 2007, according to Mr. de Guzman's records. Thus, it is believed that the "February 8, 2007" interview date indicated on said form PTOL-413 is in error.

- During said telephone interview, the Examiner and Mr. de Guzman discussed issues with regards to certain claims, which the Examiner believed to contain recitations that were deficient under 35 U.S.C. § 112. Further, the Examiner indicated that the independent claims were not sufficiently novel.

- Mr. de Guzman requested that the rejections under 35 U.S.C. § 112 be placed in writing via a formal Office Action, so that the nature and extent of said rejections can be fully ascertained and replied to.

- Mr. de Guzman indicated that he was not in a position to provide at that time any amendments to the claims via the telephone interview to address the novelty issues, since no references had been cited at that point to definitely reject the claims for lacking novelty. Mr. de Guzman requested that the novelty rejections be set forth in a formal Office Action, again so that the nature and extent of said rejections can be fully ascertained and replied to.

- The Examiner's summary in the form PTOL-413 states that Mr. de Guzman "indicate[d] that he will amend the claims to reflect the novelty of the instant invention." It is

respectfully submitted that is statement in the form PTOL-413 is a bit inaccurate. Mr. de Guzman indicated, as explained above, that he wished to see the novelty rejections set forth in writing with citations to reference(s), so that the nature and extent of said rejections can be fully ascertained and replied to. Upon further review of such formal written novelty rejections, Mr. de Guzman would then consider whether any claim amendments are appropriate—Mr. de Guzman however did not definitively state in the telephone interview that claim amendments to address novelty would in fact or certainly be made, as the summary in the form PTOL-413 and page 2 of the final Office Action seem to indicate.

Nevertheless, amendments to the claims as explained below are being provided herein so as to facilitate prosecution towards allowance. It is hoped that said amendments will be satisfactory to the Examiner to establish patentability of the claims.

III.   Rejections under 35 U.S.C. 112, second paragraph

The final Office Action rejected claims 51-78 and 80-97 under 35 U.S.C. § 112, second paragraph for allegedly being indefinite. These rejections are addressed in turn below. It is believed that the claim amendments above and/or the comments below sufficiently address the indefiniteness rejections. Page 11 of the final Office Action requested that the most specific page and line numbers to the disclosure be provided when addressing these rejections, and are thus provided below. The Examiner's cooperation and assistance would be very much appreciated, if there are any further issues that still remain unresolved hereinafter.

A.   Discussion of independent claim 60 and its dependent claims

The final Office Action asserted that the claimed "**a searchable format**" in independent claim 60 is not clear. While it is respectfully submitted that the previously claimed "a searchable format" is indeed clear, claim 60 is nevertheless amended herein to recite --a searchable text format--. Support for this amendment can be found, for example, in page 13, lines 9-15 that describes textual content of the electronic documents that are indexed in the server unit 202, so as to allow the engine 122 to perform text search queries on the contents of

the server unit 202. Dependent claim 54, which previously recited "searchable text format" is canceled herein without prejudice in view of the amendment to claim 60.

With regards to a term "**using**" that was recited in previously presented claim 60, this "using" term was a typographical error, and has been deleted in currently amended claim 60. Thus, it is believed that the alleged defect to claim 60 with respect to the term "using" has been addressed and/or rendered moot.

With regards to the term "**metadata**," the final Office Action identified an antecedent basis issue in claim 60, which has been addressed as shown in amended claim 60. Further, the final Office Action asserted that "it is not clear what the metes and bounds of the claimed … 'metadata'." This assertion by the final Office Action is respectfully traversed. A person skilled in the art having the benefit of the applicants' original disclosure would understand the meaning of "metadata" in claim 60.

For example, page 4, lines 9-10 of the present application describes metadata for email messages as "date/time stamps, author identification, attachment data, tracking IDs, headers." As another example, page 16, lines 4-5 of the present application describe the metadata as including "threading information, attachments, properties, directory structures." Further, page 19, lines 6-7 of the present application describe metadata as including "conversational thread information, properties, and other electronic characteristics of the files." Still further, claim 57 (which is dependent on claim 60) clarifies that the metadata of claim 60 can include threading information. In view of this description of metadata, it is therefore respectfully submitted that the metadata recited in claim 60 is definite.

As further support for the position that the metadata recited in claim 60 would be understandable to a person skilled in the art having the benefit of the applicants' disclosure and who would be interpreting the scope of claim 60, the following is an example definition of metadata (meta-data or meta data) found in the Free Online Dictionary of Computing (at http://foldoc.org/?meta-data). This online definition is consistent with the description and examples of metadata provided in the present application and as understood by a person skilled in the art:

"Data about data. In data processing, meta-data is definitional data that provides information about or documentation of other data managed within an application or environment. For example, meta-data would document data about data elements or attributes, (name, size, data type, etc) and data about records or data structures (length, fields, columns, etc) and data about data (where it is located, how it is associated, ownership, etc.). Meta-data may include descriptive information about the context, quality and condition, or characteristics of the data."

Thus, it is again respectfully submitted that the metadata recited in previously presented claim 60 is definite.

Nevertheless to facilitate prosecution, claim 60 is amended as shown to clarify that the electronic files have electronic characteristics that include metadata. In other words, the metadata are electronic characteristics of the electronic files. Support for this amendment can be found, for example, on page 7, line 23 and elsewhere in the present application. Thus, further definiteness for metadata has now been provided in claim 60.

In view of the above discussion pertaining to metadata, it is kindly requested that the indefiniteness rejection of claim 60 on the basis of the term "metadata" be withdrawn.

With respect to the phrase "**in a manner**" recited in claim 60, this term has been deleted to address and/or render the indefiniteness rejection moot. In the accompanying phrase claim 60 has been amended herein to recite --said storing including storing information of said directory structure of the received data structure so as to maintain said directory structure--. This amendment finds support on page 13, lines 15-18 of the present application, which describes storing directory path information in the server unit 204. Page 19, lines 14-17 further describes storage of directory path information, and page 15, lines 19-23 describes maintaining the directory structure.

With respect to the phrase "**a specified characteristic**," the final Office Action stated that "it is uncertain what does the claimed 'a specified characteristic' referred to (i.e., Does it referred to input query keywords? Or the characteristic relates to a conventional threading

20

information? Or others?)." As clarification, it is noted herein that the specified characteristic can indeed include "keywords," "threading information," and "others" such as described in the present disclosure. To provide further definiteness to claim 60, the phrase "a specified characteristic" is amended herein to recite --a specified <u>text or metadata</u> characteristic--, which clarifies that the specified characteristic in the request can be text, metadata, or combination of text and metadata of the electronic file(s). Support for this amendment can be found, for example, on page 13, line 24 to 15, line 8 and elsewhere in the present application, where a search query can specify text, metadata, or a combination of both.

      The claims that depend upon claim 60 are amended as shown to make their language consistent with amended claim 60 and/or otherwise amended to place such claims in better form.

      In view of these amendments to claim 60 and its dependent claims, it is kindly requested that the corresponding indefiniteness rejections be withdrawn.

      B.   <u>Discussion of independent claim 69 and its dependent claims</u>

      With respect to independent claim 69, the final Office Action alleged the same defects with regards to the terms "a searchable format" and "metadata." Claim 69 is amended to address these alleged defects in a manner similar to the other claims above and as previously explained above.

      The final Office Action further indicated that the claimed "**a displayable format**" should also be defined. While it is believed that the recited "a displayable format" is indeed definite, claim 69 is nevertheless amended as shown to facilitate prosecution and to provide further definiteness.

      Specifically, claim 69 is amended to recite --a format <u>displayable on a display screen</u>--. Support for this amendment can be found, for example, on page 18, lines 9-15 of the present application, which describes conversion of the emails into converted files 326 having a format (such as HTML) that can be displayed in a browser window at the terminal 114. Furthermore, page 8, lines 13-14 of the present application explains that the terminal 114 can have a display screen 118 to allow users to view information sent to/from the server 112. Still

further, Figure 4 and the accompanying description on page 21, line 9 to 22, line 9 of the present application show and describe an email message 416 displayed on the display screen 118 of the terminal 114.

   The claims that depend upon claim 69 are amended as shown to make their language consistent with amended claim 69 and/or otherwise amended to place such claims in better form.

   In view of these amendments to claim 69 and its dependent claims, it is kindly requested that the corresponding indefiniteness rejections be withdrawn.

   C. <u>Discussion of independent claim 75 and its dependent claims</u>

   With respect to independent claim 75, the final Office Action alleged the same defects with regards to the terms "a searchable format," "a displayable format" and "metadata." Claim 75 is amended to address these alleged defects in a manner similar to the other claims above and as previously explained above.

   Furthermore, the final Office Action stated that the recited phrase "to cause a computer processor" is indefinite. Accordingly, to provide further definiteness, claim 75 is amended to recite that the instructions are --<u>executable</u> by a computer processor--. Support for this amendment can be found, for example, in lines 1-2 of claim 28 as originally filed on page 39 of the present application.

   Additionally, claim 75 is amended to recite --computer-readable medium--, instead of "machine-readable medium." Support for this amendment can be found, for example, on page 10, lines 7-8 and page 12, line 9 and elsewhere in the present application.

   The claims that depend upon claim 75 are amended as shown to make their language consistent with amended claim 75 and/or otherwise amended to place such claims in better form.

   In view of these amendments to claim 75 and its dependent claims, it is kindly requested that the corresponding indefiniteness rejections be withdrawn.

    D. <u>Discussion of independent claim 82 and its dependent claims</u>

    With respect to independent claim 82, the final Office Action alleged the same defects with regards to the terms "a searchable format," "a specified characteristic," and "metadata." Claim 82 is amended to address these alleged defects in a manner similar to the other claims above and as previously explained above.

    Furthermore, the final Office Action stated that the phrase "a means" as recited throughout claim 82 renders the claim indefinite "because it is unclear if it represents a single means or multiple means."

    Claim 82 is amended as shown to address this indefiniteness rejection. Specifically:

    - A "first means" is recited in claim 82 for receiving a plurality of electronic files from an information system 130. An example of the first means is disclosed as the conversion engine 134 in Figure 1 and the accompanying description on page 11, lines 19-22. Figure 3 and the accompanying description on page 15, line 25 to page 16, line 19 of the present application provide additional disclosure of the electronic files received by the conversion engine 134 from the information system 130.

    - The first means includes a means for recursively extracting. The means for recursively extracting are shown as the recursive engines 312-316 in Figure 3, and which are described in page 16, line 20 to page 18, line 2 and elsewhere in the present application.

    - The first means includes a means for converting the extracted electronic files to a searchable text format and for storing the converted electronic files in a first server unit in the searchable text format. This means for converting/storing is shown as an administrative program 336 in Figure 3, and described in page 19, line 25 to page 20, line 5 in the present application, specifically for managing and indexing the converted files 326 and 330 to allow text searches.

    - The first means includes a means for converting, including for obtaining and storing in a second server unit, said metadata. This means for converting the metadata is shown as the controller 320 and upload unit 332 in Figure 3, and is described on page 19, lines 6-10 and elsewhere in the present application.

- The first means includes means for converting the electronic files to a read-only format and for storing the converted electronic files in the read-only format. This means for converting/storing are shown as the controllers 318 and 322 and the converters 324/328 in Figure 3, and described in page 18, line 4 to page 19, line 5 and elsewhere in the present application.

- The indentation/alignment of the sub-paragraphs reciting these various elements of the first means is adjusted as shown, so as to improve the clarity and readability of claim 82.

- A "second means" (to distinguish from the "first means") is recited in claim 82 for receiving a request for electronic files having a specified text or metadata characteristic. This second means is disclosed as a server 112 in Figure 2 that receives queries from the client terminals 114, and is described for example on page 5, lines 7-8; page 13, lines 24-25; and elsewhere in the present application.

- A "third means" (to distinguish from the "first means" and the "second means") is recited in claim 82 for applying the request to the stored metadata to determine a set of electronic files having the specified text or metadata characteristic. This third means for applying is shown as the engine 122 in Figure 2, and described in page 13, line 25 to page 15, line 8 of the present application as applying the text or metadata in the query to the server units 202 or 204 to find results.

In view of these amendments to claim 82, it is respectfully submitted that claim 82 meets definiteness requirements.

Dependent claim 83 is amended to more particularly correspond to the converter 324, converter 328, and upload unit 332 in Figure 3.

In view of these amendments to claim 82 and its dependent claim 83, it is kindly requested that the corresponding indefiniteness rejections be withdrawn.

E.   Discussion of independent claim 85 and its dependent claims

With respect to independent claim 85, the final Office Action alleged the same defects with regards to the terms "a searchable format," "a specified characteristic," and "metadata." Claim 85 is amended to address these alleged defects in a manner similar to the other claims above and as previously explained above.

Moreover, the final Office Action asserted that the phrases "to receive," "to analyze," etc. in claim 85 "are intended functions that about to happen but unclear if they actually did, hence, it renders the claim to be indefinite." This assertion of indefiniteness is respectfully traversed herein.

Specifically, it is respectfully submitted that the "to receive," "to analyze," etc. phrases in claim 85 do not render claim 85 indefinite. These "to" phrases in claim 85 are analogous to phrases such as "adapted to," "configured to," "enabled to," "operative to," etc. that have been long-accepted by the U.S. Patent Office.

For example and with regards to the term "capable," MPEP § 2173.05(g) states the following:

> It was held that the limitation used to define a radical on a chemical compound as "incapable of forming a dye with said oxidizing developing agent" although functional, was perfectly acceptable because it set definite boundaries on the patent protection sought. *In re Barr*, 444 F.2d 588, 170 USPQ 33 (CCPA 1971).

As another example and with regards to the term "operative," MPEP § 2173.05(g) states the following (emphasis ours):

> In *Innova/Pure Water Inc. v. Safari Water Filtration Sys. Inc.*, 381 F.3d 1111, 1117-20, 72 USPQ2d 1001, 1006-08 (Fed. Cir. 2004), the court noted that the claim term "operatively connected" is "a general descriptive claim term frequently used in patent drafting to reflect a functional relationship between claimed components," that is, the term "means the claimed components must be connected in a way to perform a designated function." "In the absence of modifiers, general descriptive terms are typically construed as having their full meaning." *Id*. at 1118, 72 USPQ2d at 1006. In the patent claim at issue, "subject to any clear and unmistakable disavowal of claim scope, the term 'operatively connected' takes the full breath of its ordinary meaning, i.e., 'said tube [is] operatively connected to said cap' when the tube and cap are arranged in a manner capable of performing the function of filtering." *Id*. at 1120, 72 USPQ2d at 1008.

As yet another example, MPEP § 2111.04 explicitly allows the use of terminology such as "adapted to," "adapted for," and "wherein" clauses. It is therefore respectfully submitted that the phrases "to receive," "to convert," etc. in claim 85 are also acceptable terminology, such as those discussed above, and can therefore properly remain in the claims in which such phrases are recited.

Furthermore, the USPTO has repeatedly and consistently allowed the use of the phrases "configured to, "operative to," "capable of," and various "to" phrases in many other granted patents. A search of claims of issued U.S. patents revealed that such language is present in at least one-half million issued U.S. patents (474,090 or more patents). Consistently, therefore, the USPTO has taken the position that the phrases "configured to, "operative to," "capable of," and "to" phrases are so well understood in the arts that such phrases do not warrant objection and removal from the present claims.

However, to facilitate prosecutions, claim 85 is nevertheless amended as shown to render claim 85 further definite. For example, the phrase "to convert" has been amended to -- converting--. The claims that depend upon claim 85 are also amended in a consistent manner. It is understood that these amendments to claim 85 are being made merely to provide further definiteness, and further that these amendments are not intended to (and do not) invoke the provisions of 35 U.S.C. § 112, sixth paragraph, since for example, the amended claims recite sufficient structure.

In view of these amendments to claim 85 and its dependent claims, it is kindly requested that the corresponding indefiniteness rejections be withdrawn.

IV.   Discussion of the claims and cited references

The final Office Action rejected claims 51-78 and 80-97 under 35 U.S.C. § 103(a) as being anticipated by Johnson (U.S. Patent No. 5,813,009) in view of an article by Philip J. O'Shea entitled "European Law Database: An Experiment in Retrieval." For the reasons set forth below, these rejections are respectfully traversed.

      A.   Discussion of independent claim 60

Independent claim 60 as amended herein recites, *inter alia*, "said received plurality of electronic files having <u>electronic characteristics that include metadata</u>" and "<u>obtaining the metadata</u> from each of the recursively extracted electronic files, and <u>storing the metadata</u> in a second server unit, said storing including <u>storing information of said directory structure of the received data structure so as to maintain said directory structure</u>." It is respectfully submitted that none of the cited references, whether singly or in combination, meet these limitations.

For example, page 6 of the final Office Action has cited the "Scan and Index" section in column 28, line 49 to column 29, line 47 of Johnson as allegedly meeting the limitations in previously presented claim 60 pertaining to metadata. However, it is respectfully submitted that Johnson does not meet the above-quoted limitations in amended claim 60.

For example, the term "metadata" is nowhere to be found in Johnson at all. Indeed, this is the case because Johnson does not obtain and store metadata in the manner recited in claim 60. In particular, the cited passage in column 28, line 49 to column 29, line 47 of Johnson describes his process for <u>scanning</u> documents into images. As explained in the present application on page 4, lines 5-10, scanning hardcopies into an imaging database results in <u>lost</u> metadata. For instance, when an email is printed into a hardcopy and scanned into an imaging database, the date/time stamps, tracking IDs, and other metadata are lost. Accordingly, since Johnson uses "industry-standard" scanner devices, he necessarily loses the metadata or other electronic characteristics associated with an original electronic form of his documents.

Indeed, since Johnson is using scanner-devices, he is necessarily scanning hardcopies (*e.g.*, not electronic files as recited in claim 60) and such hardcopies necessarily do not and cannot have "electronic characteristics that include metadata" as recited in claim 60. Thus, claim 60 is allowable over Johnson.

Furthermore, Johnson's column 28, lines 61-65 describe a user's attaching of index information to imaged cases and sub-documents. It is respectfully submitted that this indexing does not meet the limitations of claim 60 that specify "obtaining the metadata from each of the recursively extracted electronic files, and storing the metadata in a second server unit,

said storing including storing information of said directory structure of the received data structure so as to maintain said directory structure." Specifically, the user in Johnson manually indexes the hardcopy documents, and therefore does not perform the recited obtaining the metadata (which are electronic characteristics) from electronic files, and Johnson is completely silent as to any storing of metadata that includes storing directory structure information to maintain the directory structure. That is, column 28, lines 61-65 of Johnson disclose that the user can "organize the documents for formal filing and retrieval," but this discussion merely pertains to the manner in which the user may index/organize the scanned (hardcopy) documents and makes no mention as to the extent of how the user's indexing/organizing maintains (if at all) any directory structure in which the original documents were arranged. Absolutely nothing is disclosed, taught, or suggested that this indexing/organizing by Johnson is performed (1) by storing metadata (electronic characteristics) from electronic files, with (2) said storing including storing directory structure information so as to maintain the directory structure. Hence, claim 60 is further allowable over Johnson.

It is respectfully submitted that O'Shea does not cure the deficiencies of Johnson. For instance, Section 2.1 and Figures 1-2 of O'Shea disclose a "Celex" database having certain fields: title, text, keywords, legal form, etc. Thus, it is abundantly clear that this disclosure of O'Shea is not that of stored metadata (electronic characteristics) obtained from electronic files, but is rather the textual content of his documents themselves. Thus, even if O'Shea were to be combined with Johnson, the limitations in claim 60 pertaining to metadata would still not be met.

Furthermore, there is teaching against combining Johnson with O'Shea to meet the limitations in claim 60 pertaining to metadata. For instance, Johnson scans his hardcopy documents into an electronic image—this is inherently a process that will result in lost metadata (electronic characteristic) of original electronic files. Since Johnson scans hardcopy documents, he teaches against using any method or apparatus for obtaining/storing metadata. Thus, even if O'Shea arguably obtains/stores metadata, there is teaching in Johnson against combining with O'Shea.

Accordingly, claim 60 is allowable over O'Shea, whether singly or in combination with Johnson.

Claim 60 as amended further recites, *inter alia*, "recursively extracting the plurality of electronic files <u>from a plurality of paths of said directory structure</u> of the data structure that is received from the external information system." Support for this amendment can be found, for example, on page 16, lines 15-18 of the present application.

Page 6 of the final Office Action admitted that Johnson does not disclose this limitation. To supply these missing teachings of Johnson, the final Office Action cited Section 4.6 of O'Shea. However, it is respectfully submitted that O'Shea does not cure the deficiencies of Johnson.

In particular, Section 4.6 of O'Shea describes a process to increase the computational efficiency of document searching, by listing relevant documents together in a cluster. To build clusters, O'Shea adds each document to a nearest existing cluster, or uses a document to create a new cluster if that document's distance from all clusters exceeds a certain threshold. He applies his cluster-building algorithm a number of times, first to divide the data into large clusters and then "recursively" to break down the large clusters into smaller clusters.

This is the extent of any "recursively" disclosed in O'Shea. He mentions absolutely nothing about the documents in the "large clusters" as being in a <u>directory structure</u> having <u>a plurality of paths</u>, and further mentions nothing about extracting files <u>from the plurality of paths</u>, such as recited in claim 60. Indeed, since Section 4.6 of O'Shea explicitly describes "listing" the members in his clusters, this suggests that he in fact does not use a directory structure having paths at all, but instead uses an organization technique that groups documents together using document ID numbers or other document identification. In other words, since O'Shea groups documents into clusters by listing the members in each cluster, this arrangement necessarily does not implement a directory structure having a plurality of paths.

Hence, claim 60 is further allowable over O'Shea, whether singly or in combination with Johnson.

It is noted that Section 4.1 of O'Shea describes "tree-structured indexes." However, it is evident that this "tree-structured index" is a tree-structure of component parts of a particular individual document itself, rather than a directory structure having electronic files in a

plurality of paths, thereby permitting the "recursively extracting the plurality of electronic files from a plurality of paths of a directory structure," as recited in claim 60.

B.   <u>Discussion of the other independent claims</u>

Independent claims 69, 75, 82, and 85 are amended to recite, *inter alia* and using varying language, recursively extracting the plurality of electronic files from a plurality of paths of a directory structure. Further, claims 69, 75, 82, and 85 are amended to further clarify that the electronic files have electronic characteristics that include metadata.

As previously explained above, these limitations are not disclosed, taught, or suggested by Johnson or O'Shea, whether singly or in combination. For example, Johnson is completely silent as to any recursive extraction and paths of a directory structure, and O'Shea mentions nothing about recursive extraction from plurality of paths of a directory structure.

Further, Johnson performs scanning of hardcopy documents, and therefore loses metadata and other electronic characteristics. Indeed, he is completely silent as to electronic characteristics that include metadata.

Hence, claims 69, 75, 82, and 85 are allowable.

V.   <u>Conclusion</u>

Overall, none of the references singly or in any motivated combination disclose, teach, or suggest what is recited in the independent claims. Thus, given the above amendments and accompanying remarks, the independent claims are now in condition for allowance. The dependent claims that depend directly or indirectly on these independent claims are likewise allowable based on at least the same reasons and based on the recitations contained in each dependent claim.

If the applicants' attorney has overlooked a teaching in any of the cited references that is relevant to the allowability of the claims, the Examiner is requested to specifically point out where such teaching may be found. Further, if there are any informalities or questions that can be addressed via telephone, the Examiner is encouraged to contact Mr. de Guzman at (206) 622-4900.

The Director is authorized to charge any additional fees due by way of this Amendment, or credit any overpayment, to our Deposit Account No. 19-1090.

All of the claims remaining in the application are believed to be allowable. Favorable consideration and a Notice of Allowance are earnestly solicited.

Respectfully submitted,

SEED Intellectual Property Law Group PLLC

/Dennis M. de Guzman/

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Dennis M. de Guzman
Registration No. 41,702

DMD:sc

701 Fifth Avenue, Suite 5400
Seattle, Washington 98104
Phone: (206) 622-4900
Fax: (206) 682-6031

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